

Message

From: WEISS, MICHAEL [weiss.michael@epa.gov]
Sent: 2/14/2020 12:20:36 AM
To: Jay Rao [JRao@dcorllc.com]
CC: Howell, Adam [Howell.Adam@epa.gov]
Subject: RE: Platform Edith Inspection Report

Thanks for the response Jay. I will send out a meeting invite for that Friday 2/21 with call-in info. Let me know if the time listed in the invite does not work for you.
Thanks,
Mike

From: Jay Rao <JRao@dcorllc.com>
Sent: Thursday, February 13, 2020 3:19 PM
To: WEISS, MICHAEL <weiss.michael@epa.gov>
Cc: Howell, Adam <Howell.Adam@epa.gov>
Subject: RE: Platform Edith Inspection Report

Hi Michael,
Sorry for the delay; I just got back from India. Yes, 2/21 would work better for me. Also, please let me know what is the best time to call you.
Regards,
Jay

From: WEISS, MICHAEL <weiss.michael@epa.gov>
Sent: Wednesday, February 12, 2020 5:27 PM
To: Jay Rao <JRao@dcorllc.com>
Cc: Howell, Adam <Howell.Adam@epa.gov>
Subject: RE: Platform Edith Inspection Report

Hi Jay,
Thank you for the response. Adam and I had a questions regarding the response to the inspection report that hopefully we can clarify over a telephone call next week.
The questions were regarding clarification on the schematic discussed in response to area of concern 2, the interpretation of commingled from the permit, the reporting and sampling of the deck drainage discharge, and the reporting of the well treatment/workover fluid discharges.
Please let me know your availability for a call on 2/18, 2/20, or 2/21.
Thanks again,
Mike

Michael Weiss
Wastewater Section (ENF-3-1)
Enforcement Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415.947.4570

From: Jay Rao <JRao@dcorllc.com>
Sent: Thursday, January 16, 2020 1:55 PM

To: WEISS, MICHAEL <weiss.michael@epa.gov>

Subject: RE: Platform Edith Inspection Report

Hi Michael,
Please below for DCOR's response to your areas of concerns:

1. Operation and maintenance (This area of your concern addresses the issues related to Rust and Corrosion):
DCOR's Response: To mitigate this problem, DCOR follows the following API-recommended standards
 - API 510, 570 and 653 for inspections of vessels, process piping and tanks
 - API RP 2 SIM for structural inspections
 - NACE SP 169/176 for Cathodic protection
 - While descaling/cleaning the structure, vessels, tanks or piping by needle gun, grit blasting or by other means, DCOR's policy is to collect all the generated debris on a tarp or a similar material so that no debris goes into the ocean
2. Documentation:
 - Please see the attachment for Lead Operator's comments, schematics and disposal pile inspections.
3. Reporting of commingled waste stream:
 - Sanitary waste stream(005) is never commingled with produced water. It has its own stand-alone discharge pipe. Please see the attached images.
 - Whenever Deck Drain(004) is discharged separately, we report that in our NetDMRs. As per the NPDES permit, whenever it is commingled with the produced water, we have to report no discharge of deck drain and all the requirements of produced water must apply.
4. Sampling:
 - Please see attached daily pollution observation reports. Whenever deck drain is discharged separately, its volume is reported; and during discharge the operator observes the receiving water for any sheen. If any sheen is observed, then the discharge will cease. The permit doesn't require Oil and Grease testing.
5. Reporting of Well Treatment Discharge:
 - Well Treatment, Completion and Workover fluids are always commingled with produced water at Edith. Whenever we decide to discharge them separately, it will be reported as required by the permit.
6. Reporting of Well Treatment Chemical Inventory: We always maintain chemical inventory for all our platforms in our centralized system, known as share drive. Whenever there is any usage of any chemical, we submit this as an attachment with quarterly NetDMRs.

If you have any question or need anything further, please let me know.

Regards,

Jay Rao
DCOR, LLC

From: WEISS, MICHAEL <weiss.michael@epa.gov>

Sent: Monday, November 25, 2019 2:49 PM

To: Jay Rao <JRao@dcorllc.com>

Cc: Howell, Adam <Howell.Adam@epa.gov>; james.salmons@bsee.gov; Steve Calhoun <SCalhoun@dcorllc.com>; Brent Cook <BCook@dcorllc.com>

Subject: Platform Edith Inspection Report

Jay,

Please find attached EPA's inspection report for our September 2019 Clean Water Act compliance inspections of Platform Edith. Feel free to contact me with any question.

Best Regards,
Mike

Michael Weiss
Wastewater Section (ENF-3-1)
Enforcement Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415.947.4570

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